

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

MALIBU MEDIA, LLC,)
Plaintiff,)
v.) Case No.: 1:13-cv-00357-RJJ
MARC WILSON)
Defendant.)

**MOTION FOR EXTENSION OF TIME
IN WHICH TO ANSWER OR OTHERWISE PLEAD**

NOW COMES Defendant, MARC WILSON, by and through his attorney Jeffrey J. Antonelli of Antonelli Law Ltd., and pursuant to L.R.7.1(d), moves this Court for an extension of time of 28 days in which to answer the Complaint or otherwise plead, in support of which he states as follows:

1. The instant action was filed as a John Doe complaint on or about April 1, 2013, with Summons issued as to Defendant MARC WILSON on June 7, 2013.
2. Plaintiff filed its Amended Complaint naming Defendant Marc Wilson on June 6, 2013, and served Defendant on or about July 15, 2013.
3. Counsel for Plaintiff and counsel for Defendant have engaged in settlement negotiations, and settlement negotiations are expected to continue in good faith.
4. Pursuant to Local Rule 7.1.(d), counsel for Defendant has attempted to reach counsel for Plaintiff seeking agreement to the instant motion for an extension of time to answer or otherwise plead while settlement negotiations continue, but recently has been unable to reach counsel for Plaintiff whose telephone number appears to be not functioning properly. Multiple emails have been sent.

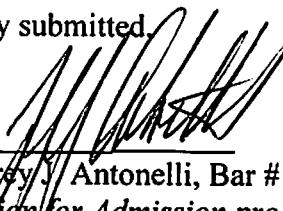
5. In addition, Counsel for Defendant's Motion for Admission *pro hac vice* is being submitted to this Court simultaneously with this motion pursuant to Local Rule 83.1(c)(iii).

WHEREFORE, Defendant, MARC WILSON, moves this Court to extend the time in which he has to answer the Complaint herein or otherwise plead an additional 28 days, up to and including September 2, 2013.

Dated: August 5, 2013

Respectfully submitted,

By:

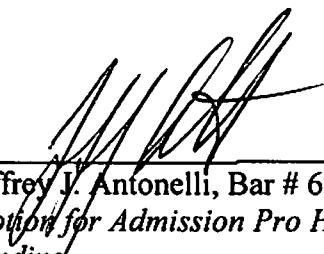

Jeffrey J. Antonelli, Bar # 6271875 *✓*
Motion for Admission pro hac vice pending
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CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2013, I caused to be filed the foregoing with the Clerk of the Court by FEDEX and to the following counsel of record by FEDEX, regular US Mail, and by email to paul@nicoletti-associates.com.

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